REMARKS

Claims 1 to 4, 6 to 12, 14, and 16 to 26 are in the application, of which claims 1, 12 and 17 are independent. Favorable reconsideration and further examination are respectfully requested.

Initially, we thank Examiner Nguyen for the courtesies extended to the undersigned in a telephone interview conducted on July 29, 2009. Although no specific agreement was reached, we discussed amending the independent claims to place the firewall features in the bodies of the independent claims, rather than in their preambles. As explained during the interview, the applied Venkatsubra reference does not disclose or suggest a client application behind a first firewall, a server application is behind a second firewall, and at least one device, which performs the claimed method, that not behind either the first firewall or the second firewall. The only reference we can find to firewalls in Venkatsubra is in paragraph 0004, which indicates that application layer proxies can act as firewalls. This is not believed to render the foregoing features of claim 1 obvious.

During the interview, the Examiner also explained her interpretation of the data transfer that occurs in Venkatsubra. Referring to Fig. 4 of Venkatsubra below, as we understand it, the Examiner is interpreting (for example) the "data packets from client" to be a command received by a server (the application layer proxy).
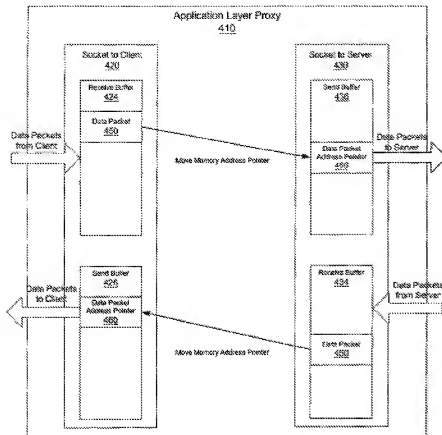
Figure 4

The Examiner explained that a command in the "data packets from client" could be for a

Web page, which would be received from the server ("data packets from server"), and

thereafter sent back to the client ("data packets to client"). Hence, the Examiner explained

that in her opinion, Venkatsubra discloses "receiving, from [a] client application, a

command to obtain data in…at least one queue that is destined for the client application".

Likewise, according to the same logic, in the Examiner's view, Venkatsubra discloses

"receiving, from [a] server application, a command to obtain data in..at least one queue that

is destined for the server application". We thank the Examiner for this clarification.

To address the Examiner's concern, we have amended independent claim 1 as

shown below (the underlines indicate additions to the claim):

> receiving, from the client application, a command to obtain data in the at least one
> queue that is destined for the client application and that is present at a time the command
> from the client application is received, and receiving, from the server application, a
> command to obtain data in the at least one queue that is destined for the server
> application and that is present at a time the command from the server application is
> received, the command received from the client application being a hypertext transfer
> protocol (HTTP) command to retrieve data from the at least one device, and the
> command received from the server application being an HTTP command to retrieve data
> from the at least one device.[1]

These amendments would seem to address the Examiner's concerns. That is, if we

interpret the "data packets from client" in Venkatsubra as a command to obtain a Web

page, in the scenario described above, the Web page data (which would be received from

the server in response to such a command) would not be present at the time the command

from the client application is received. The same holds true for the corresponding features

relating to the server application. Accordingly, we submit that the communication

facilitated by the application layer proxy described in Venkatsubra is not the same, and

thus does not render obvious, the foregoing features of claim 1.

Bahl and Hovell were cited for their alleged disclosure of assigning identifiers to

communication sessions, and are not believed to remedy the foregoing deficiencies of

Venkatsubra vis-à-vis claim 1.

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[1] Support for these amendments can be found, e.g., from page 18, line 13 to page 19, line 11 of the
application.

For at least the foregoing reasons, claim 1 is believed to be patentable over the applied art. Independent claims 12 and 17 are counterparts to claim 1, and are also not believed to be rendered obvious by the applied art.

Dependent claims are also believed to define patentable features. Each dependent claim partakes of the novelty of its corresponding independent claim and, as such, has not been discussed specifically herein.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

In view of the foregoing amendments and remarks, the entire application is believed to be in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Applicant's attorney can be reached at the address shown below. Telephone calls regarding this application should be directed to 617-521-7896.

Please apply any deficiencies or credit any overpayment to Deposit Account 06-1050, referencing 11333-026001.

Respectfully submitted,

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August 19, 2009

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